

1 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO  
2 235 Montgomery Street  
Suite 450  
3 San Francisco, California 94104  
(415) 391-3900

4 Laurie J. Bartilson  
5 BOWLES & MOXON  
6 6255 Sunset Boulevard  
Suite 2000  
7 Hollywood, California 90028  
(213) 661-4030

8 Attorneys for Plaintiff  
9 CHURCH OF SCIENTOLOGY INTERNATIONAL

RECEIVED  
MAR 6 1992  
HUB LAW OFFICES

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY )  
INTERNATIONAL, a California )  
13 not-for-profit religious )  
corporation, )

14 )  
15 Plaintiff, )

16 vs. )

17 GERALD ARMSTRONG; DOES 1 )  
through 25, inclusive, )

18 Defendants. )  
19 )

Case No. 152229

PLAINTIFF'S NOTICE  
OF TAKING DEPOSITION AND  
REQUEST FOR PRODUCTION  
OF DOCUMENTS

20 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

21 PLEASE TAKE NOTICE that Plaintiff CHURCH OF SCIENTOLOGY  
22 INTERNATIONAL will take the deposition of Defendant GERALD ARMSTRONG  
23 whose address is known to Plaintiff and its counsel, on ~~Monday~~<sup>WED.</sup>,  
24 March 18, 1992 at 9:00 a.m. at the offices of Wilson, Ryan &  
25 Campilongo, 235 Montgomery, Suite 450, San Francisco, California  
26 94104. This deposition will be taken before a certified shorthand  
27 reporter and Notary Public, or other such person authorized to  
28 administer oaths who may be present at such time and place. The

1 depositions will continue from day to day, excluding weekends and  
2 legal holidays, until completed. Pursuant to Section 2025(1) of the  
3 Code of Civil Procedure, Plaintiff hereby gives notice of its intent  
4 to videotape said deposition.

5 PLEASE TAKE FURTHER NOTICE that pursuant to Section 2031 of the  
6 Code of Civil Procedure, Plaintiff hereby demands that the deponent  
7 produce the documents described on Exhibit A attached hereto.

8 Dated: March 5, 1992.

WILSON, RYAN & CAMPILONGO

9  
10 BY: 

11 Andrew H. Wilson  
12 Attorneys for Plaintiff  
13 CHURCH OF SCIENTOLOGY  
14 INTERNATIONAL  
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DEFINITIONS AND INSTRUCTIONS

"DOCUMENT" shall be understood to apply to any record or communication, including records of any telephonic communication, that would be a "writing" as provided by California Evidence Code Section 250, and shall include, without limitation, originals, duplicates or non-identical copies, drafts, working papers, routing slips, post-its, marginalia, and similar materials as well as machine readable data stored on cards, disks, magnetic tapes, audiotapes, videotapes or other storage media.

DOCUMENTS TO BE PRODUCED

1. All documents in your possession which in any way refer to the Church of Scientology International, the Religious Technology Center, L. Ron Hubbard, any local Church of Scientology, or any organization affiliated with any of the above;

2. All documents obtained by you from L. Ron Hubbard of any of the organizations defined in paragraph 1. above;

3. All documents delivered to you at any time by Joseph Yanny;

4. All documents delivered at any time by you to Joseph Yanny; and

5. All documents relating to any of the persons or organizations described in paragraph 1. above which you delivered at any time to Ford Greene, Esq., provided, however, that this request shall not be construed to request documents which comprise attorney-client communications or attorney work product.

Exhibit A

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PROOF OF SERVICE

I declare that I am employed in the City and County of San Francisco, California.

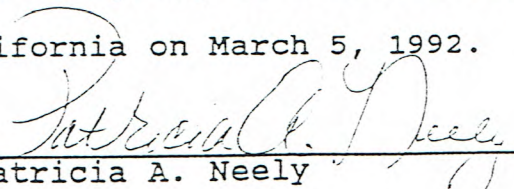
I am over the age of eighteen years and not a party to the within entitled action. My business address is 235 Montgomery Street, Suite 450, San Francisco, California.

On March 5, 1992, I caused the attached PLAINTIFF'S NOTICE OF TAKING DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS to be served on the following in said cause, by placing the same for hand delivery on this day in the ordinary course of business, a true copy thereof enclosed in a sealed envelope. The envelope was addressed as follows:

Ford Greene, Esq.  
711 Sir Francies Drake Boulevard  
San Anselmo, CA 94960-1949

I declare under the penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California on March 5, 1992.

  
\_\_\_\_\_  
Patricia A. Neely